



STATEMENT OF BASIS
FIRE TRAINING AREA NO. 1
SOLD WASTE MANAGEMENT UNIT NO. 32
45TH SPACE WING
CAPE CANAVERAL AIR FORCE STATION
BREVARD COUNTY, FLORIDA



PURPOSE OF STATEMENT OF BASIS

This Statement of Basis (SB) has been developed in order to inform the public and give the public an opportunity to comment on a proposed remedy to clean up contamination at the Fire Training Area No. 1 (FTA 1). A 45th Space Wing (45th SW) installation restoration partnering (IRP) team consisting of United States Air Force (USAF), United States Environmental Protection Agency (USEPA), the State of Florida Department of Environmental Protection (FDEP), the U. S. Army Corps of Engineers, and various environmental consultants have determined that the proposed remedy is cost effective and protective of human health and the environment. However, prior to implementation of the proposed remedy, the 45th SW IRP team would like to give an

Brief Site Description

Fire Training Area No. 1 is located within Space Launch Complex 46 on CCAFS (See Figure 1). Between 1954 and 1965, various flammable wastes were applied to the ground at the site, ignited, and used for fire-fighter training drills.

opportunity for the public to comment on the proposed remedy. At any time during the public comment period, the public may comment as described in the "How Do You Participate" section of the SB. Upon closure of the public comment period, the 45th SW IRP team will evaluate all comments and issues raised in the comments and determine if there is a need to modify the proposed remedy prior to implementation.

WHY IS CLEANUP NEEDED?

The results of the Remedial Investigation (RI)

indicated that two volatile organic compounds (VOCs) and two metals (listed in Table 1) were present in the groundwater at levels that could be potentially harmful to human health.

HOW DO YOU PARTICIPATE?

The 45th SW IRP team solicits public review and comment on this SB prior to implementation of the proposed remedy as a final remedy. The final remedy for FTA 1 will eventually be incorporated into the Hazardous and Solid Waste Amendments (HSWA) Permit for Cape Canaveral Air Force Station (CCAFS).

The public comment period for this SB and the proposed remedy will begin on the date of publication of notice of availability of the SB in major local newspaper of general circulation and end 45 days thereafter. If requested during

The Clean-up Remedy

The proposed clean-up remedy for FTA 1 includes (but is not limited to) the following components:

- Natural attenuation of groundwater to remove contaminants through natural processes.
- Implementation of land use controls designed to prevent exposure to site contaminants. These include:
 - Prohibition of residential development
 - Periodic monitoring of groundwater to document water quality and contaminant levels
 - Posting warning signs on-site

A complete list of land use controls and other protective measures are found in the FTA 1 Land Use Control Implementation Plan (LUCIP).

the comment period, the 45th SW IRP team will hold a public meeting to respond to any oral comments or questions regarding the proposed remedy. To request a hearing or provide comments, contact the following person in writing within the 45-day comment period:

Mr. Jorge Caspary
FDEP-Bureau of Waste Cleanup
2600 Blair Stone Road, MS-4535
Tallahassee, FL 32399-2400
E-mail: Jorge.Caspary@dep.state.fl.us
Telephone: (850) 921-9986

The HSWA Permit, the SB, and the associated Administrative Record, including the RI report, will be available to the public for viewing and copying at:

Environmental Management, CEV/ESC
Facility 1638, Samuel Phillips Parkway
Cape Canaveral Air Force Station, FL
For public access call (321) 853-0965

This information can also be found on-line at http://www.mission-support.org/45SW_IRP_EA

The HSWA Permit, the SB, and FTA1 Report summaries will be available for viewing and copying at:

Central Brevard Library
308 Forrest Avenue
Cocoa, FL, 32922

To request further information, you may contact one of the following people:

Ms. Teresa Green
Environmental Restoration Element Chief
45 CES/CEVR
1224 Jupiter Street
Patrick Air Force Base, FL 32925-3343
E-mail: teresa.green@patrick.af.mil
Telephone: (321) 853-0965

Mr. Jorge Caspary
See previous contact information

Mr. Timothy R. Woolheater, P. E.
EPA Federal Facilities Branch
Waste Management Division
Sam Nunn Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960
E-mail: woolheater.tim@epamail.epa.gov
Telephone: (404) 562-8510

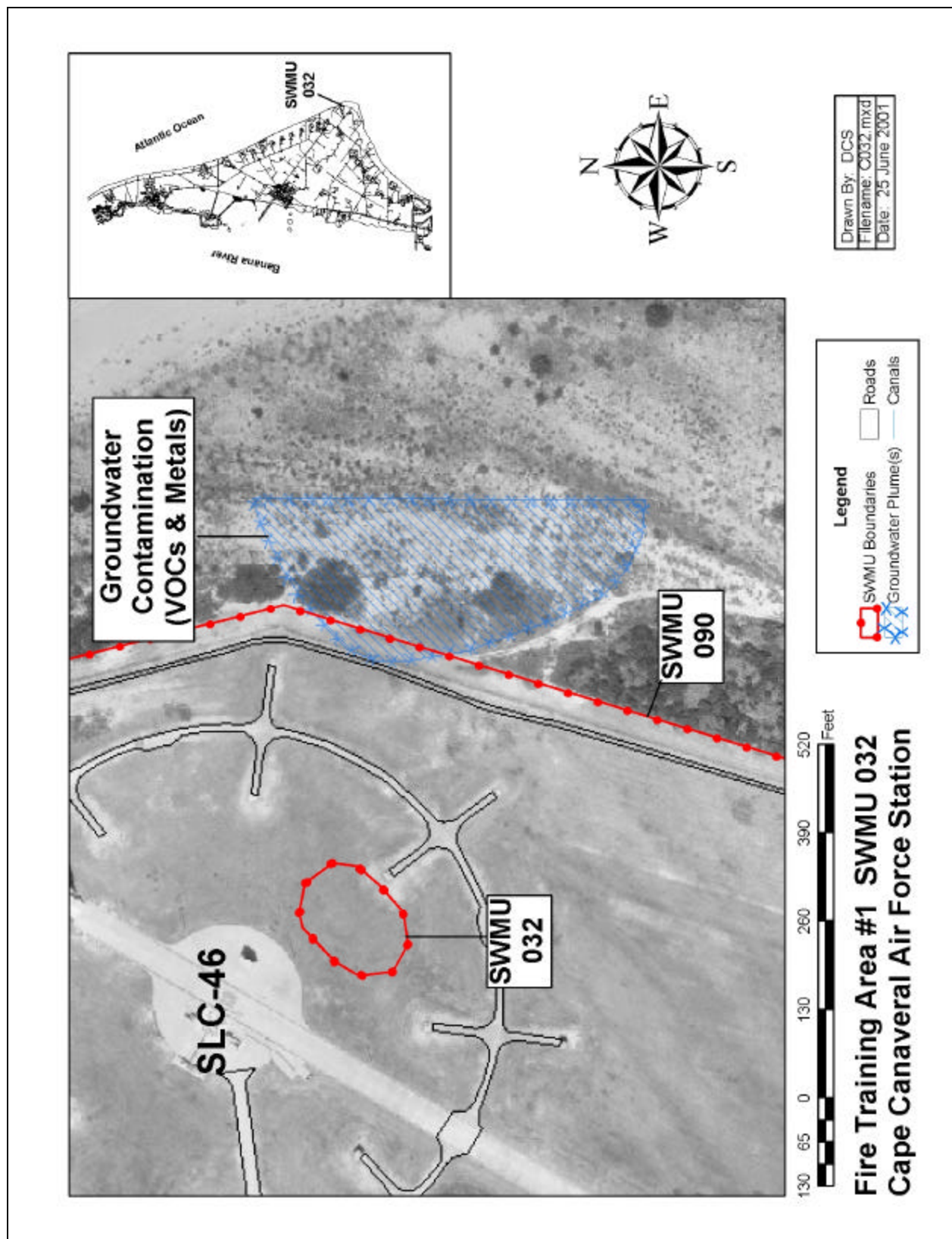
FACILITY DESCRIPTION

USAF established the 45th SW as the primary organization for the Department of Defense aerospace force programs. Historically, the National Aeronautics and Space Administration (NASA) also performed space launch related operations on the 45th SW property. These operations have involved the use of toxic and hazardous materials. Under RCRA and the HSWA Permit (CCAFS Permit No. FL2800016121) issued by the USEPA, the 45th SW was required to perform an investigation to determine the nature and extent of contamination from Solid Waste Management Unit (SWMU) No. 32, Fire Training Area No. 1.

SITE DESCRIPTION AND HISTORY

FTA 1 was used as a firefighter training area from 1954 to 1965. During that time, petroleum, oil and lubricant (POL) waste, halogenated and nonhalogenated solvents, and contaminated fuels were applied to the soil and ignited. Prior to 1985, FTA 1 was located within Space Launch Complex 43 (SLC-43). SLC-43 was used for meteorological rocket launches from 1962 to 1985. In 1985, SLC-43 was decommissioned and a new Space Launch Complex, SLC-46, was built in its place. SLC-46 was built by the U.S. Navy for the launches of Trident II (D-5) missiles and is known as the Missile Launch Test Facility. During the decommissioning of SLC-43 and the construction of SLC-46, the area was re-graded and new roads and structures were constructed.

The USAF conducted the following investigations:



In accordance with RCRA Section 7004(b), this Statement of Basis summarizes the proposed remedy for CCAFS Fire Training Area No. 1. For detailed information, consult the Fire Training Area No. 1 RI Report which is available for review at the 45th SW Environmental Management Office (See "How Do You Participate") or on-line at http://www.mission-support.org/45SW_IRP_EA.

- 1984: A Phase I Records Search including records review, site reconnaissance, and interviews with knowledgeable aerospace personnel identified areas of concerns which warranted further investigation.
- 1986-1988: A Phase II Confirmation/Quantification investigation was conducted, during which groundwater and soil samples were collected. This investigation concluded that the presence of constituents in soil and groundwater might pose a risk to human health and the environment. The Phase II investigation recommended that a Phase III Investigation (RI) be conducted to assess the nature and extent of the contamination present at the site, and perform risk assessments to determine if the contamination is detrimental to human or ecological health.
- 1988-1997: The RI was initiated in 1988 and documented in a report that also addressed a number of other Sites. This RI was unable to adequately characterize and assess the contamination at FTA 1. Consequently, a more robust RI was initiated in 1994 and detailed the sampling and analysis of site soil and groundwater. These results were used to determine human health and ecological risks. The Human Health Risk Assessment (HHRA) indicated that potential risk exists from the site's groundwater. The Ecological Risk Assessment (ERA) indicated that no unacceptable ecological risk is present at the site.
- 1996-1997: A Feasibility Study (FS) was performed in order to select the appropriate remedy for the site. It was determined that monitoring of groundwater would be needed to ensure that contaminant levels are naturally attenuating in the subsurface and that land use controls would be implemented to ensure that human health would be protected from unacceptable exposure to site groundwater.

- 1997: A Long Term Monitoring (LTM) Workplan was submitted in 1997 and LTM was initiated. The 45th SW IRP team felt it was incumbent to implement LTM immediately following the RI/FS in order to ensure that groundwater contaminants were appropriately monitored and tracked.

SUMMARY OF SITE RISK

As part of the RI activities, an HHRA and an ERA were conducted to estimate the health and environmental risks associated with the site-specific contamination. The risk assessments were performed in accordance with risk management decision processes established by the USEPA, FDEP, and the USAF at the time the RI was initiated.

The Chemicals of Concern (COCs) identified for human health during the RI were:

- Groundwater: antimony, arsenic, benzene, vinyl chloride

Surface water and sediment features were not present on the site, and were therefore not evaluated as a source of potential human health risk. The HHRA indicated that arsenic in soil might pose an unacceptable risk to base personnel. A comparison with Residential Risk-Based Criteria (RBCs) also indicated potential risk to hypothetical future residents. However, during the risk management decision process, it was determined that arsenic concentrations in soil did not exceed background arsenic concentrations detected in soils throughout CCAFS.

Groundwater risk was also assessed based on direct comparison with conservative screening values. Risk management considerations were used as a basis for eliminating several potential contaminants of concern. These considerations include non-replication of results with subsequent sampling, proximity to the ocean (for sodium), comparison with background levels, and comparison with Region III RBCs.

Following risk management, antimony, arsenic, benzene, and vinyl chloride remained as COCs. Based on these COCs, an LTM program was implemented in 1997, and is on-going.

The ERA was conducted to evaluate the possibility that land organisms (eco-receptors) may be at risk from site-related contaminants. The ERA was based on laboratory analyses of groundwater and soil samples.

The ERA concluded that potential risk from the exposure to and/or ingestion of groundwater or soil by eco-receptors is marginal. Several factors mitigate the potential concern. These could include routine facility operation and maintenance activities, less than optimal habitat found within facility boundaries, and the extent of the eco-receptor's normal foraging area.

WHAT ARE THE CLEANUP OBJECTIVES AND LEVELS?

The remedial action objective (RAO) is to protect humans from exposure to shallow groundwater and prevent consumption of groundwater from the shallow aquifer (where contaminant concentrations are higher than regulatory standards). Table 1 lists the COCs present at FTA 1. The first column lists the chemical name, the second lists the maximum concentration detected in the impacted medium at FTA 1 during the RI, and the last column presents the clean-up level to be achieved at the site.

TABLE 1— CLEANUP GOALS

Site-Related Chemicals of Concern (COCs)	Maximum Detected Concentration (ug/L)	Site-Specific Clean-up Level ¹ (ug/L)
GROUNDWATER		
Antimony	31	6
Arsenic	180	50
Benzene	1.6	1.0
Vinyl Chloride	1.3	1.0

¹ Clean-up level represents the most stringent among USEPA and FDEP criteria at the time of the final investigation.

CLEANUP ALTERNATIVES FOR FTA 1

Clean-up alternatives are different combinations of plans to restrict site use and to contain, remove, and/or treat contamination in order to protect public health and the environment. Only two alternatives were considered because of low levels of contamination present at the FTA 1. The clean-up alternatives considered for the FTA 1 are summarized below.

No Action: Evaluation of the No-Action alternative is used as a basis for comparison with other alternatives. Under this alternative, no remedial action would be taken to reduce human health risks or restrict site use. No monitoring of COC concentrations in the groundwater would be performed. It was determined this alternative would not attain the RAO.

Land Use Controls with Long Term

Monitoring: Under this alternative, material processes such as biological degradation, dispersion, advection, and adsorption would reduce COC concentrations to cleanup levels over time. Groundwater would be regularly sampled and analyzed to monitor and document the decrease in contaminant concentrations. Data collected during the RI and other Basewide assessments indicate that contaminant concentrations will be reduced

below cleanup levels within 30 years. Additionally, the 45th SW would implement site-specific land use controls to protect against exposure to contaminated shallow groundwater and to prevent consumption of shallow groundwater. In the long term, this remedy alternative will meet RAOs and will also allow re-evaluation to determine if the remedy is working and provide an opportunity for change if necessary. The 45th SW, USEPA, and FDEP have entered into a Memorandum of Agreement (MOA), which outlines how land use controls will be managed at the 45th SW. The MOA requires periodic inspections, condition certification, construction project coordination, and agency notification. Site specific details can be found in the FTA 1 Land Use Control Implementation Plan (LUCIP).

EVALUATION OF REMEDY ALTERNATIVES

Each cleanup alternative was evaluated to determine how each potential remedy would comply with the four general standards for corrective measures. The four general standards for corrective measures are:

- Overall protection of human health and the environment;
- Attain media cleanup standards;
- Control the sources of releases; and
- Comply with standards for management of wastes

The second alternative (Land Use Controls and Natural Attenuation with Long-Term Monitoring) meets each of the above criteria, while the no action alternative remedy would not meet them.

LAND USE CONTROLS AGREEMENT

By separate MOA dated 23 December 1999, with USEPA and FDEP, CCAFS, on behalf of the Department of the Air Force, agreed to implement base-wide, certain periodic site inspection, condition certification, and agency notification procedures designed to ensure the

maintenance by installation personnel of any site-specific land use controls deemed necessary for future protection of human health and the environment. A fundamental premise underlying execution of that agreement was that through the USAF's substantial good-faith compliance with the procedures called for therein, reasonable assurances would be provided to the USEPA and FDEP as to the permanency of those remedies which included the use specific land use controls.

Although the terms and conditions of the MOA are not specifically incorporated or made enforceable herein by reference, it is understood and agreed by the USAF, USEPA, and FDEP that the contemplated permanence of the remedy reflected herein shall be dependent on CCAFS's substantial good-faith compliance with the specific land use control maintenance commitments reflected therein. Should such compliance not occur or should the MOA be terminated, it is understood that the protectiveness of the remedy concurred in may be reconsidered and that additional measures may need to be taken to adequately ensure necessary future protection of human health and the environment.

WHAT IMPACTS WOULD THE CLEANUP HAVE ON THE LOCAL COMMUNITY?

There would be no impacts to the surrounding communities because groundwater underlying the site is not used for potable water. The natural attenuation and LTM alternative includes administrative actions to limit the use of groundwater until cleanup levels have been reached and to ensure that construction activities do not cause contaminant re-distribution. Additionally, residential use of the FTA 1 is not occurring nor is it expected in the near future. As long as CCAFS remains an active gateway for the aerospace industry, FTA 1 is expected to continue operating in an industrial capacity.

WHY DOES THE 45th SW IRP TEAM RECOMMEND THIS REMEDY?

The team recommends the proposed remedy because the naturally occurring biodegradation process observed at the site (and predicted with base groundwater models) are sufficient for the removal of low concentrations of VOCs. The low concentration of metals should be monitored to ensure that concentrations are diminishing through other attenuation processes (advection, dispersion, adsorption, etc). The LTM program will be used to assess and document reduction in contaminant concentrations to the cleanup goals. The land use controls will also prevent exposure to contaminants prior to the cleanup levels being achieved. The proposed remedy meets the four general standards for corrective measures.

NEXT STEPS

The 45th SW IRP team will review all comments on this SB to determine if the proposed remedy needs modification prior to implementation and prior to incorporating the proposed remedy into the CCAFS HSWA permit. If the proposed remedy is determined to be appropriate for implementation, then the LTM program will be continued, the land use controls will be initiated, and a Land Use Control Implementation Plan will be developed and incorporated into the MOA.



LAND USE CONTROL IMPLEMENTATION PLAN

FIREFIGHTER TRAINING AREA NO.1 (FTA 1) SOLID WASTE MANAGEMENT UNIT 32 (SWMU NO. 32) 45TH SPACE WING CAPE CANAVERAL AIR FORCE STATION BREVARD COUNTY, FLORIDA

Facility Description

Firefighting Training Area No. 1 (FTA 1), Solid Waste Management Unit 32 (SWMU No. 32) was used as a firefighter training area from 1954 to 1965. During that time, petroleum, oil and lubricant (POL) waste, halogenated and nonhalogenated solvents, and contaminated fuels were applied to the soil and ignited. Prior to 1985, the site was located within Space Launch Complex 43 (SLC-43) that was used for meteorological rocket launches from 1962 to 1985. In 1985, SLC-43 was decommissioned and a new launch complex, SLC-46, was built in its place. SLC-46 was built by the US Navy for the launches of Trident II (D-5) missiles and is known as the Missile Launch Test Facility. During the decommissioning of SLC-43 and the construction of SLC-46, the area was re-graded and new roads and structures were constructed.

Location

(Reference Site Map on last page of this document)

Site Plan Coordinate	Northing	Easting
North	1499586.34	807823.74
West	1499492.81	807730.20
South	1499424.83	807780.16
East	1499535.80	807895.78

Objective

Implementation of site-specific land use controls to protect against exposure to contaminated shallow groundwater and to prevent consumption of the shallow groundwater.

Land Use Controls (LUCs) to be Implemented

Administrative:

- The property will be prohibited from residential or other non-industrial development without prior written notification to the Florida Department of Environmental Protection (FDEP) and the United States Environmental Protection Agency (USEPA) concerning the SWMU land use change. Dependent on site conditions and the nature and intensity of the proposed land use change, additional site investigations and

LUCIP
FTA 1 (SWMU NO. 32)
CAPE CANAVERAL AIR FORCE STATION
OCT 2001

assessments could be required for the United States Air Force (USAF). Based on these analyses, additional remedial measures may be required prior to land use change.

- Perform and document baseline LUC audit upon finalization of the Statement of Basis.
- Perform and document quarterly LUC compliance inspections in accordance with 45th SW LUC Operations Manual.
- Perform, document, and report an annual audit on LUC implementation, maintenance, and compliance in accordance with the 45th SW LUC Operations Manual and the current CCAFS Corrective Action Management Plan (CAMP).
- The property Land Use Control Implementation Plan (LUCIP) shall remain in effect until:
 - a) Changes to applicable Federal and State risk-based clean-up standards occur which indicate site contaminants no longer pose potential residential risk; or
 - b) Reduction in site contaminant concentrations to below Federal and State residential risk-based clean-up standards occurs.
- In the event of property realignment, transfer, or re-use for non-industrial or non-commercial purposes, assessment and remediation may be necessary to ensure that impacts to ecological receptors are not increased or to mitigate potential ecological impacts where residual contamination exists.

Groundwater:

- The consumptive use of the site's surficial aquifer groundwater will be prohibited.
- Incidental consumption and dermal exposure to groundwater from the surficial aquifer will be prevented. This will be addressed by the project proponent's health and safety advisor.
- Groundwater will not be contacted, pumped, or discharged during property development, maintenance, or construction, without:
 - a) USAF review, coordination, and approval of the proposed construction/development plans via AF Form 103 (Base Civil Engineer Work Clearance Request), 332 (Base Civil Engineer Work Request), 813 (Request for Environmental Impact Analysis), or similar process;
 - b) Ensuring proper engineering controls are in-place so that unauthorized release or disposal of the affected media (groundwater) does not occur. This includes conducting appropriate testing and developing a disposal plan in accordance with the LUC Operations Manual prior to any pumping or discharge of groundwater; and
 - c) Use of proper personal protection equipment by site workers, as determined by the project proponent's occupational health and safety advisor.
- USAF will institute a long term monitoring (LTM) program of groundwater in the

LUCIP
FTA 1 (SWMU NO. 32)
CAPE CANAVERAL AIR FORCE STATION
OCT 2001

surficial aquifer in accordance with an approved LTM work plan and the CAMP as part of the CCAFS HSWA Permit. Reports will be submitted annually, along with revised work plan recommendations, until such a time as the relevant regulatory agencies agree that contaminant concentrations in groundwater no longer warrant long term monitoring.

- The site will be posted with proper warning signs in accordance with the LUC Operations Manual and the CCAFS HSWA permit.

Statement of Basis:

The Statement of Basis (SB) is currently being reviewed. It is anticipated that the SB will be accepted/incorporated into the HSWA Permit, scheduled for issuance early in 2002.

Additional Information:

Long Term Monitoring Plan: LTM will be implemented on a annual basis to monitor the fate of arsenic in groundwater. Natural Attenuation (NA) is evaluated through LTM. Currently, as per the LTM Workplan and Annual Report, monitoring wells and surface water locations are sampled semi-annually. The scope and magnitude of the LTM program are reviewed and adjusted annually, based on recent data trends.

Pertinent Document Reference:

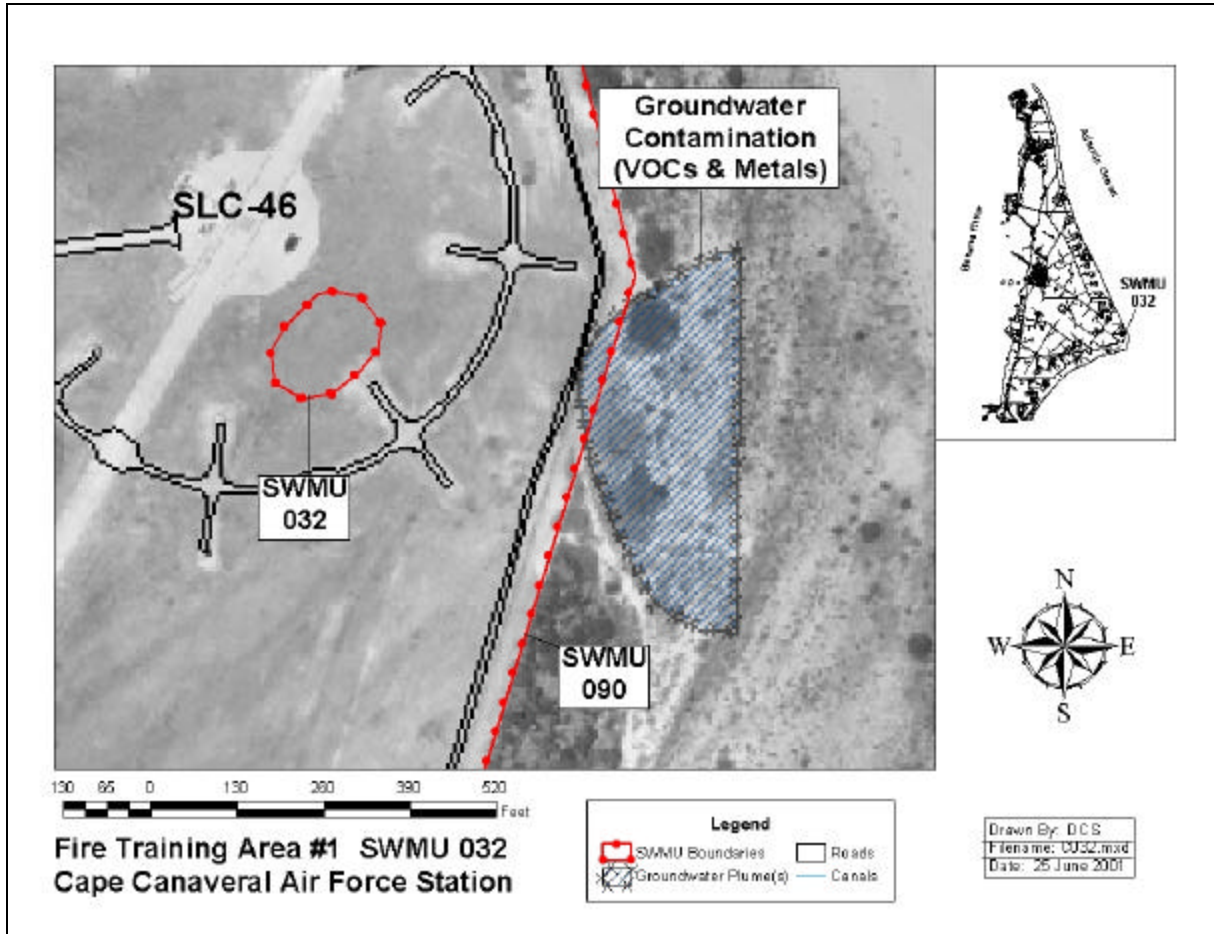
Remedial Investigation/Feasibility Study, Cape Canaveral Firefighter Training Area No.1 (FTA 1), SWMU No. 32, O'Brien & Gere Engineers, Inc., December 1996.

Long Term Monitoring (Interim Measures) Work Plan, Cape Canaveral Firefighter Training Area No.1 (FTA 1), SWMU No. 32, BEM Systems, Inc., October 1997.

Long Term Monitoring Annual Report No. 3, Cape Canaveral Firefighter Training Area No.1 (FTA 1), SWMU No. 32, BEM Systems, Inc., July 2000.

LUCIP
FTA 1 (SWMU NO. 32)
CAPE CANAVERAL AIR FORCE STATION
OCT 2001

Firefighter Training Area No. 1 (FTA1) - Site Map



Please contact the 45 SW Installation Restoration Program Office to obtain additional information, including: the 45 SW Land Use Controls Operation Plan; the CCAFS HSWA Permit; a complete record of corrective actions at FTA 1; or other related documents, guidance, and regulations. The IRP office can be reached by phone at (321) 853-0965. Information can also be obtained via the IRP website at http://www.mission-support.org/45SW_IRP_EA